

VII. Grant Adjustments/Other Sub-Grantee Expectations

- a. Problem notification/adjustment requests and grant adjustment notices
 - i. Sub-grantees that experience significant programmatic or financial grant award challenges that will detrimentally affect the timeliness, quality implementation, and/or outputs/outcomes of the grant award must submit to their grant manager an electronic Problem Notification/Grant Adjustment Request form (even if these problems have been outlined in a quarterly programmatic report). Potential reasons for submitting this form to JGA include: significant startup or staff hiring/retention challenges; a lack of referrals; program model adherence/implementation challenges; stakeholder/partnership conflicts; and financial expenditure and/or accounting problems.
 - ii. All sub-grantees experiencing such problems complete the first part of the form and must identify the specific, detailed steps they are taking to remedy the problem. Sub-grantees complete the second part of the form if, as a result of the identified problem, they are requesting a formal grant adjustment from JGA. Sub-grantees not experiencing a significant grant problem but that want to request a grant adjustment complete only the second part of the form.
 - iii. The JGA grant manager shares all received forms with the JGA director, and in consultation with the director, provides feedback to sub-grantees' within one week of receiving the form. For identified problems, if needed, the grant manager outlines for sub-grantees specific tasks with associated timelines for addressing the identified problems as well as any technical assistance resources as requested or recommended. Sub-grantees must make and report to JGA sufficient progress towards accomplishing these tasks or face corrective action. For grant adjustment requests, the grant manager and Director determine whether to approve or deny the request, and if approved, the grant manager completes and sends a Grant Adjustment Notice to sub-grantees outlining the approved adjustments. Grant managers save copies of all Problem Notification/Grant Adjustment and Grant Notices in the JGA share drive and hard copy grant files.
- b. Corrective actions and de-obligation
 - i. Sub-grantees that exhibit consistent and/or significant administrative, financial and/or programmatic grant non-compliance face a series of corrections actions from JGA. First, JGA provides sub-grantees with written recommendations for improvement with associated timelines, and requests written progress reports towards completion of these tasks. Second, if sub-grantees fail to make sufficient progress then they will be designated as a high risk sub-grantee, with potential consequences for the continuation of their current grant award and for their ability to secure further funding from JGA in the subsequent fiscal year. Upon being designated a high-risk sub-grantee, the grant manager and JGA director meet with the sub-grantee programmatic and fiscal point of contact and agency executive director to discuss the findings and to develop a final remediation plan with concrete deliverables and a thirty day timeline to demonstrate significant improvement. Third and finally, sub-grantees that exhibit continued noncompliance receive notification through a formal

letter signed by the JGA Director that their funds will be de-obligated. Sub-grantees can refer to 28 CFR Part 18 for appeal rights in the event of grant award termination.

1. Sub-grantees that have an award de-obligated are not eligible to receive an award from JGA in the next fiscal year.
2. Sub-grantees whose awards are prematurely terminated are subject to the same requirements regarding audit, recordkeeping, and submission of reports as a project that runs for the duration of the project period.
3. Grant managers and the JGA director identify an eligible sub-grantee to receive the de-obligated funds so the funds can be spent-down by the end of the award period; as per District policy, these funds do not need to be re-competed.

c. Sub-grantee files and audits

- i. As outlined in sub-grantees' award agreements, sub-grantees must maintain a grant award file inclusive of all of the same documents maintained by JGA, which includes, amongst other documents: the final project application, budget, and signed certifications and assurances; award letter, summary, and award agreement; EEOP waiver form; requests for reimbursement and support documentation; match forms and support documentation; equipment purchase and sole source justification forms if applicable; programmatic and performance measure reports; site visit assessment findings; problem notification/grant adjustment requests and grant adjustment notices; and all other significant grant correspondence and documents. JGA grant managers review this grant file at a minimum once a year during the award site visit.
- ii. JGA, the DC Inspector General and the Department of Justice, or any of its authorized representatives, have access for purposes of audit and examination of any books, documents, papers, and records of the sub-grantee related to the grant award at any time. In addition, sub-grantees must maintain all grant records for at least three years after the completion of the grant period or until an audit is completed and/or any litigation is resolved and all questions arising from these reviews are resolved. Grant records must be sufficient for the DC Inspector General's auditors or a certified independent auditor (one who is not an employee of the sub-grantee or a member of the sub-grantees' board) to audit the award records and determine whether the costs incurred and billed are allowable under the terms of the grant award.
- iii. If sub-grantees expend \$500,000 or more in JGA federal funds, sub-grantees are required to conduct a single audit in accordance with the provisions of OMB Circular A-133. A copy of the audit findings must be provided to JGA and maintained on file with JGA and the sub-grantee.